UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In Re: Methyl Tertiary Butyl Ether ("MTBE")

Products Liability Litigation

Master File No. 1:00 - 1898 MDL 1358 (VSB)

This Document Relates to:

New Jersey Department of Environmental Protection, et al. v. Atlantic Richfield Co., et al., No. 1:08-CV-00312-VSB

STIPULATION AND [PROPOSED] ORDER

On or about September 28, 2018, the Court granted Plaintiffs' Unopposed Motion for Leave to File a Fifth Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, newly-added Defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil (collectively the "newly-added Lukoil Defendants"), and existing Defendants Lukoil Americas Corporation and Getty Petroleum Marketing Inc., that the newly-added Lukoil Defendants, Lukoil Americas Corporation and Getty Petroleum Marking Inc. shall have until May 28, 2019 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: March 25, 2019

AGREED TO BY:

AKIN GUMP STRAUSS HAUER & FELD LLP

KATHERINE M. KATCHEN

Two Commerce Square

2001 Market Street, Suite 4100

Philadelphia, PA 19103

(215) 965-1200

Counsel for Newly-Added Lukoil Defendants

BLEAKLEY PLATT & SCHMIDT, LLP

Mathewa. Paisi / HME

One North Lexington Avenue

White Plains, NY 10601

(914) 949-2700

Counsel for Lukoil Americas Corporation & Getty Petroleum Marketing Inc.

MILLER & AXLINE, P.C.

Michael Ardine/ AME DUANE C. MILLER

MICHAEL AXLINE

1050 Fulton Ave., Suite 100

Sacramento, CA 95825

(916) 488-6688

Counsel for Plaintiff

ane Faley / AME

Deputy Attorney General

New Jersey Attorney General's Office

Division of Law

Environmental Enforcement & Environmental Justice Section

25 Market Street, 7th floor

Trenton, NJ 80625-0093

SO ORDERED,

Dated: March 26 _____, 2019

Vernon S. Broderick

United States District Judge